

## CHAPTER 12 TRANSPORTATION OF RCWM

12-1. Introduction. This chapter documents the transportation and disposal procedures for RCWM.

12-2. Transportation Regulatory Requirements. Transportation operations of RCWM will follow DA and other regulatory guidelines. Some of the major requirements include:

- a. Packaging, labeling, and manifesting the waste in accordance with 40 CFR 262.20 through 262.31.
- b. Using the EPA identification numbers for the site as the generator of the hazardous waste and the identification number for the destination of the waste listed on the hazardous waste manifest.
- c. Following applicable state, EPA, DOT, OSHA, and Army requirements for worker training and the transportation of hazardous waste.
- d. Following security guidelines provided in AR 190-11 and AR 50-6.
- e. Follow 50 USC 1512-1517.

12-3. Organizational Responsibilities.

a. PMCD. The PMCD has command responsibility to ensure that the RCWM is handled in a safe and environmentally acceptable manner. The PMCD has responsibility for overseeing RCWM handling activities such as monitoring, inspecting, labeling, documenting, loading, trans-loading, unloading, and transporting. A PMCD coordinator will be identified for this transportation effort to ensure all required coordination is conducted and responsibilities are fulfilled. Other PMCD responsibilities include:

(1) Developing a hazard analysis that addresses the relative risk associated with the planned transportation of RCWM. This analysis should identify variables that impact selection of landing areas and air corridors. In addition, the hazard analysis should assess transportation activities along the selected truck and air routes and risks associated with the vehicles or aircraft selected for this mission.

(2) Coordinating to ensure that all transportation operations are conducted in a safe and environmentally acceptable manner.

(3) Coordinating to ensure that the RCWM is properly packaged and repackaged, if required.

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(4) Coordinating to ensure that standby decontamination and medical support is available during all phases of the transport operation.

(5) Coordinating RCWM movement with the TEU.

(6) Monitoring the status of the movement in coordination with the SBCCOM.

(7) Coordinating the Transportation Plan with the DHHS.

(8) Coordinating RCWM movement with the state emergency management agencies for all states along the transportation route.

b. District. The responsibilities of the executing USACE district with regard to RCWM transportation include:

(1) Providing proper notification to the USEPA and state regarding the transportation operation.

(2) Providing physical security and emergency response capabilities in direct support of TEU transportation activities.

(3) Signing the hazardous waste manifest as a generator of the RCWM (RCRA hazardous waste). As generator of the waste, the district retains accountability until the waste is transferred to the receiving arsenal.

(4) Notifying the National Response Center and the state officials of RCWM spills within the state, if releases exceed the reportable quantity.

(5) Providing communications equipment to be used by the TEU supervisor, site safety officer, and the PM while transferring the RCWM from the IHF to helicopter for off-site transport. The radios and telephones permit communications among key organizations and with emergency services organizations.

(6) Ensuring that the TEU has all required permits to transport hazardous materials/waste through each jurisdiction, as required.

(7) Providing transport vehicle(s) to move RCWM from the IHF to the embarkation point.

c. SBCCOM. The responsibilities for SBCCOM include the following:

(1) Arranging for all aircraft and providing trained crews required to support the Transportation Plan.

- (2) Coordinating air transportation with the appropriate agencies.
- (3) Transporting RCWM from the site to the final disposition site via helicopter and airplane.
- (4) Operating an operations center to monitor the complete movement of RCWM to the arsenal for disposal.
- (5) Implementing loading, trans-loading, and unloading plans for all operational activities.

d. TEU. The TEU is a specialized unit of the SBCCOM that has historically been the sole escort of RCWM as required by AR 50-6. TEU has the following responsibilities for transporting RCWM:

- (1) Providing qualified escort personnel and trained emergency response teams to travel with the RCWM from the IHF until it reaches its final destination. The TEU will perform emergency response duties as required en route.
- (2) Providing and operating chemical agent monitoring equipment for first entry, trans-loading, contingency, and confirmation monitoring.
- (3) Ensuring that all personnel have completed required certification training prior to commencing the mission.
- (4) Selecting specific equipment to load, trans-load, and unload cargo and prepare a SOP for its use. The TEU will be required to develop inspection criteria to ensure equipment is operable.

12-4. Transportation Plan. PMNSCM will provide a generic version of the Transportation Plan for inclusion in the Safety Submission. Once the project is operating and RCWM has been encountered, packaged, and placed in the IHF, a site-specific plan will be produced. This plan will address all transportation matters concerning the movement of the RCWM item from the exclusion zone to the IHF and from the IHF to its final destination point.

12-5. Chemical Accident or Incident Response Assistance (CAIRA) Procedures. If there is an accident or incident during handling, loading, or unloading of the RCWM, CAIRA procedures in Chapter 4 of AR 50-6 will be followed. TEU will usually be present during handling, loading, or unloading of RCWM on USACE projects and will assume operational control of this phase of the project. USACE contractors may be required to render assistance to TEU during these accidents or incidents in the form of personnel decontamination, logistical support, or other means as approved by the CO.